

Hearing Date: December 11, 2019 at 9:30 a.m. (AST)
Objection Deadline: November 26, 2019 at 4:00 p.m. (AST)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA
Title III

Case No. 17-BK-3283 (LTS)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY,

Debtor.

PROMESA
Title III

Case No. 17-BK- 3567 (LTS)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF PUERTO RICO,

Debtor.

PROMESA
Title III

Case No. 17-BK-3566 (LTS)

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK- 3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA

Title III

Case No. 17 BK 4780-LTS

**OMNIBUS MOTION TO EXTEND DEADLINES IN ORDER GRANTING OMNIBUS
MOTION BY THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR
PUERTO RICO, ACTING BY AND THROUGH THE MEMBERS OF THE SPECIAL
CLAIMS COMMITTEE AND THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS TO (I) ESTABLISH LITIGATION CASE MANAGEMENT
PROCEDURES AND (II) ESTABLISH PROCEDURES FOR APPROVAL OF
SETTLEMENTS**

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To the Honorable United States Magistrate Judge Judith G. Dein:

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), acting by and through the members of the Special Claims Committee (the “SCC,” and hereinafter, the SCC may be more broadly referred to as the “Oversight Board”), and the Official Committee of Unsecured Creditors of all Title III Debtors (except COFINA and PBA) (the “Committee,” and together with the Oversight Board, “Movants”), hereby file this motion (the “Motion”), pursuant to section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”)² and Rules 7016, 2002, 9006, and 9019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), all made applicable to these Title III cases by section 301 and 310 of the Puerto Rico Oversight and Management, and Economic Stability Act (“PROMESA”), requesting that this Court extend certain deadlines established in the *Order Granting Omnibus Motion By The Financial Oversight And Management Board For Puerto Rico, Acting By And Through The Members Of The Special Claims Committee And The Official Committee Of Unsecured Creditors To (I) Establish Litigation Case Management Procedures And (II) Establish Procedures For Approval Of Settlements*, ECF No. 7941 in Case No. 17-3283 (the “Procedures Order”) and requesting entry of an order, substantially in the form attached hereto as Exhibit A (the “Proposed Amended Procedures Order”). Movants have filed this Motion in an omnibus fashion to avoid the burden and redundancy associated with preparing and filing nearly identical motions in numerous adversary proceedings. In support of this Motion, Movants respectfully state as follows:

² 11 U.S.C. §§ 101 *et seq.*, as incorporated into these proceedings by PROMESA, defined above.

PRELIMINARY STATEMENT³

1. To date, the Movants have worked diligently within the Procedures Order Litigation Deadlines to resolve nearly eighty (80) Vendor Avoidance Actions without formal litigation. Movants have communicated with another 150 defendants that have expressed varying degrees of interest in resolving their respective Vendor Avoidance Actions through the Information Exchange informal resolution process.

2. The Movants wish to continue the momentum of the Information Exchange process rather than require defendants to file responsive pleadings to the complaints. The commencement of formal litigation at this time in light of the current pace of collection, review, and negotiation with defendants, may be a premature, and perhaps unnecessary use of the parties' and the Court's resources where defendants would otherwise and broadly prefer to resolve the Vendor Avoidance Actions informally.

3. For these reasons, the Movants hereby request that this Court grant a modest extension (as detailed below) of the current Procedures Order Litigation Deadlines. Such an extension will not prejudice the defendants because the Procedures Order will otherwise remain in full force and effect—meaning, that the defendants are free to respond to the complaint and commence formal litigation at *any* time notwithstanding the extended deadlines.

JURISDICTION, VENUE, AND STATUTORY BASES

4. This Court has subject matter jurisdiction over this matter pursuant to section 306(a) of PROMESA.

5. Venue is proper pursuant to section 307(a) of PROMESA.

6. The statutory bases for the relief requested herein are section 105(a) of the Bankruptcy Code and Federal Rules of Bankruptcy Procedure 7016, 2002, 9006 and 9019.

³ Capitalized terms used herein shall have the meaning ascribed to them in this Motion.

FACTUAL BACKGROUND

7. The Movants incorporate by reference the “Factual Background” section of the *Omnibus Motion By The Financial Oversight And Management Board For Puerto Rico, Acting By And Through The Members Of The Special Claims Committee, And The Official Committee Of Unsecured Creditors To (I) Establish Litigation Case Management Procedures And (II) Establish Procedures For The Approval Of Settlements* ECF No. 7325, Case No. 17-3283 (the “Procedures Motion”).

8. This Court granted the Procedures Motion. *See* Procedures Order.

9. The Procedures Order established the following deadlines (together, the “Procedures Order Litigation Deadlines”) which are meant to facilitate the informal, extrajudicial resolution of the approximately 250 avoidance actions filed on behalf of the various Title III Debtors against vendors and suppliers to the Commonwealth of Puerto Rico (the “Vendor Avoidance Actions”).

- i.* **January 13, 2020:** deadline for a defendant to file and serve an answer or response to a Vendor Avoidance Action complaint (the “Response Due Date”);
- ii.* **March 9, 2020:** deadline for Movants to file an opposition to a motion to dismiss a Vendor Avoidance Action complaint (the “Motion to Dismiss Response Date”); and
- iii.* **April 13, 2020:** deadline for defendant to file a reply to motion to dismiss (the “Reply Deadline”).

10. The Procedures Order Litigation Deadlines, however, are only meant to establish outside deadlines during which the parties can comfortably engage in settlement discussions without the pressure of imminent litigation deadlines. At any time prior to the Response Due Date, a defendant may file an answer or otherwise respond to a Vendor Avoidance Action

complaint. Where a defendant opts to file a responsive pleading prior to the Response Due Date, any corresponding deadlines follow a thirty (30) day deadline schedule.

11. Concurrent with entry of the Procedures Order, the Movants began to work diligently with the defendants (and parties that signed tolling agreements) to attempt to settle or dismiss the Vendor Avoidance Actions before the Response Due Date through informal exchanges of information. In these exchanges, the Movants provide defendants information concerning their assessment of potential liability, and defendants have the opportunity to submit contracts, purchase orders, invoices and other similar documents to substantiate the payments at issue in the Vendor Avoidance Action (the “Information Exchange”).

12. Since entry of the Procedures Order, the Movants have been in contact with approximately 188 defendants, all of which have indicated varying levels of interest in participating in the Information Exchange. Specifically, approximately eighty (80) of these defendants have resolved their lawsuits; approximately forty-one (41) defendants have submitted information that is currently under review; the Movants are exploring settlements with fourteen (14) defendants because review of their information has been completed; and fifty-three (53) defendants have yet to submit requested information following informal communication with the Oversight Board.

13. There remain approximately sixty-two (62) defendants with which the Movants have not had contact.

14. To increase participation in the Information Exchange and to maximize the amount of Vendor Avoidance Actions that can be resolved through the Information Exchange process, in October 2019, the Movants began a second round of targeted outreach to the fifty-

three (53) defendants that made initial contact but which have not submitted information and the sixty-two (62) defendants with which the Movants have not had contact (the “Outreach Project”).

15. The Outreach Project has consisted of targeted mailings, phone calls, and further research efforts to locate better contact information for the defendants. The Movants have not yet completed the Outreach Project, but in the short time since they began, have made contact with several defendants that have indicated they will be able to produce the information requested not earlier than December 2019.⁴

16. The Movants’ professionals expect a substantial influx of information as a result of these efforts. They anticipate that they will be unable to collect, review, analyze, and provide a recommendation for all defendants presently participating in the Information Exchange by the Response Due Date.

17. Accordingly, the Movants respectfully assert that the current Procedures Order Litigation Deadlines will disrupt the flow of the Information Exchange and require premature formal litigation unless modestly extended as set forth below.

RELIEF REQUESTED

18. The Movants respectfully request that this Court amend the Procedures Order to (i) extend the Response Due Date to April 13, 2020; (ii) extend the Motion to Dismiss Response Date to May 13, 2020; and (iii) extend the Reply Deadline to June 13, 2020 (together, the “Extended Litigation Deadlines”).

⁴ Where a defendant expresses concern that the request for information is too voluminous, the Movants send the defendant a modified request for a sampling of the information initially requested. Certain defendants’ professed inability to provide information prior to December of this year is in response to such modified requests.

ARGUMENT

I. The Movants Have Demonstrated Good Cause to Extend the Procedures Order Litigation Deadlines.

i. Diligence Governs the Good Cause Inquiry.

19. The Movants incorporate by reference the entirety of the legal arguments in the “Basis for Relief Requested” section of the Procedures Motion as if fully set forth herein.

20. As additional support for the relief requested herein, the Movants respectfully submit that they have shown good cause for an extension of the Procedures Order Litigation Deadlines because they have been diligent in resolving and/or settling the Vendor Avoidance Actions

21. “Once a Case Management Order has been issued and the Court has set a schedule for the proceeding, the ‘schedule shall not be modified except upon a showing of good cause.’” *Citadel Broad. Co. v. Peak Broad., LLC*, CV-07-203-S-LMB, 2008 WL 11463664, at *2 (D. Idaho Jan. 24, 2008) (citing Fed. R. Civ. P. 16(b) and holding that good cause shown to extend deadlines where parties had worked diligently to proceed with discovery and potential settlement); *see also Bernardi Ortiz v. Cybex Int’l, Inc.*, CV 15-2989 (PAD), 2018 WL 2448130, at *10 (D.P.R. May 30, 2018) (holding that case management order schedule modifications require leave of court predicated on a showing of good cause and holding that extension of discovery deadline warranted where record did not show lack of diligence by moving party in pursuing discovery); *Gonzalez Melendez v. KMart Corp.*, CIV. 04-1067(DRD), 2005 WL 1847008, at *3 (D.P.R. July 29, 2005) (adopting good cause standard to determine if extension of deadlines in case management order warranted and declining to extend deadlines where moving party merely asserted that it had “too much work [and] electronic difficulties.”).

22. In turn, the primary consideration of the good cause standard is the “diligence of the party seeking the amendment.” *Citadel*, 2008 WL 11463664, at *2 (citing *Johnson v. Mammoth Recreation, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992)). A modification of the case management schedule is warranted where the parties cannot reasonably meet the deadlines despite the diligence of the party seeking the extension. *Id.* (internal citations omitted); *see also Intermountain Fair Hous. Council, Inc. v. Tassano*, 114CV00338EJLCWD, 2015 WL 5095319, at *2 (D. Idaho Aug. 28, 2015) (noting “good cause” means scheduling deadlines cannot be met despite a party's diligence (citing 6A Wright, Miller & Kane, Federal Practice and Procedure § 1522.1 at 231 (2d ed.1990))).

ii. *The Movants Have Been Diligent in Their Efforts to Resolve and/or Settle the Vendor Avoidance Actions Prior to the Response Due Date.*

23. In accordance with spirit and purpose of the Procedures Order to maximize the potential for out-of-court resolution of the Vendor Avoidance Actions and to minimize the burden on the parties’ and this Court’s resources, the Movants have, since entry of the Procedures Order, worked diligently to resolve and/or settle as many Vendor Avoidance Actions and tolling agreements as possible. As noted above, eighty (80) of approximately 250 lawsuits have been resolved consensually. Furthermore, there are approximately 150 more lawsuits that have not yet been resolved but that are subject to negotiation in the interest of avoiding formal litigation.

24. There also remain approximately sixty-two (62) defendants with which the Movants have not yet had contact but many of which, as a result of the Movants’ Outreach Project, may want to participate in the Information Exchange and resolve this matter *prior* to the initiation of formal litigation.

25. To remain consistent with the spirit of the Procedures Order and Puerto Rican business community's desire to resolve the Vendor Avoidance Actions in the most economical way possible, the Movants respectfully request that the Court grant the Extended Litigation Deadlines to permit the Movants' to collect, review, and provide recommendations on the Vendor Avoidance Actions that remain unresolved. The Movants' professionals will not be able to complete these reviews and recommendations by January 13, 2020.

26. No defendants will be prejudiced by these extensions because (i) under the Procedures Order, notwithstanding extended deadlines, the defendants are free to respond to the complaints at *any* time prior to expiration of the Extended Litigation Deadlines; and (ii) the Extended Litigation Deadlines will also confer a benefit to the defendants of postponing imminent deadlines.

27. Therefore, the Movants respectfully submit that they have met the good cause standard warranting this Court's implementation of the Extended Litigation Deadlines.

NOTICE

28. The Oversight Board has provided notice of this Motion to: (i) the Chambers of the Honorable Laura Taylor Swain; (ii) the Chambers of the Honorable Magistrate Judge Judith G. Dein; (iii) the Office of the United States Trustee for Region 21; (iv) AAFAF; (v) counsel for AAFAF; (vi) counsel for the Oversight Board; (vii) Counsel for the Creditors' Committee; (viii) Counsel for the Retiree Committee; (ix) the entities listed on the List of Creditors Holding the 20 Largest Unsecured Claims in COFINA's Title III case; (x) counsel to any other statutory committee appointed in these Title III Cases; and (xi) the defendants listed in Supplemental Appendix I (excepting those defendants where a lawsuit has already been dismissed) through their counsel, if known, through their resident agent, or a representative.

WHEREFORE, Movants respectfully request that this Court enter an order substantially in form attached hereto as Exhibit A granting the relief requested herein and granting Movants such other relief as this Court deems just and proper.

Dated: November 19, 2019.

Respectfully submitted,

/s/ Edward S. Weisfelner

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Exhibit A

Proposed Amended Procedures Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

Case No. 17-BK-3283 (LTS)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY,

Debtor.

PROMESA

Title III

Case No. 17-BK- 3567 (LTS)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF PUERTO RICO,

Debtor.

PROMESA

Title III

Case No. 17-BK-3566 (LTS)

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747).

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA

Title III

Case No. 17 BK 4780-LTS

**ORDER GRANTING OMNIBUS MOTION TO EXTEND DEADLINES IN ORDER
GRANTING OMNIBUS MOTION BY THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, ACTING BY AND THROUGH THE
MEMBERS OF THE SPECIAL CLAIMS COMMITTEE AND THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS TO (I) ESTABLISH LITIGATION
CASE MANAGEMENT PROCEDURES AND (II) ESTABLISH PROCEDURES FOR
APPROVAL OF SETTLEMENTS**

Upon the motion dated November 19, 2019 (the “Motion”) of the Oversight Board,¹ acting by and through the members of the Special Claims Committee, and the Committee, pursuant to section 105(a) of the Bankruptcy Code and Federal Rules of Bankruptcy Procedure 7016, 2002, 9019 and 9006 made applicable to this proceeding by sections 301(a) and 310 of the Puerto Rico Opportunity Management and Economic Stability Act of 2016 (“PROMESA”), 48 U.S.C. § 2161(a); and the Court having jurisdiction over this matter under 28 U.S.C. 1331, and under section 306(a)-(b) of PROMESA, 48 U.S.C. § 2166(a)-(b); and venue being proper under section 307(a) of PROMESA, 48 U.S.C. § 2167(a); and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and the Court having reviewed the Motion and any opposition thereto [and having heard the statements of counsel at the hearing held before the Court (the “Hearing”)]; and the Court having determined that the legal and factual bases set forth in the Motion [and at the Hearing] establish

¹ Capitalized terms used herein shall have the meaning ascribed to them in Motion unless otherwise noted.

just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefore, it is hereby

ORDERED that the relief requested in the Motion is granted, and it is further

ORDERED that the Procedures Order Litigation Deadlines Established in the *Order Granting Omnibus Motion By The Financial Oversight And Management Board For Puerto Rico, Acting By And Through The Members Of The Special Claims Committee And The Official Committee Of Unsecured Creditors To (I) Establish Litigation Case Management Procedures And (II) Establish Procedures For Approval Of Settlements*, ECF No. 7941 in Case No. 17-3283 (the “Procedures Order”) shall be extended to following dates:

- i.* **Response Due Date:** April 13, 2020;
- ii.* **Motion to Dismiss Response Date:** May 13, 2020;
- iii.* **Reply Deadline:** June 13, 2020; (together, the “Extended Litigation Deadlines”) and it is further

ORDERED that the Extended Litigation Deadlines shall apply to the Vendor Avoidance Actions listed in Supplemental Appendix I attached hereto (except where it is indicated that an action has been dismissed); and it is further

ORDERED that, except as modified by this Order, the Procedures Order shall otherwise remain in full force and effect; and it is further

ORDERED that this Court shall retain jurisdiction with respect to all matters relating to the interpretation and implementation of this Order.

Dated: _____, 2019.

Honorable Judith G. Dein
United States Magistrate Judge

SUPPLEMENTAL APPENDIX I

Defendant	Adversary Proceeding No.
800 Ponce de Leon Corp.* ¹	19-00064
A C R Systems	19-00057
A New Vision In Educational Services and Materials, Inc.	19-00061
Abacus Educational Services, Corp.*	19-00045
Abbvie Corp.	19-00107
Academia CEIP*	19-00052
Action To Build Changes Corp.	19-00047
AFCG Inc. d/b/a Arroyo-Flores Consulting Group, Inc.	19-00058
AFCG Inc. d/b/a Arroyo-Flores Consulting Group, Inc.	19-00347
Alejandro Estrada Maisonet	19-00059
Alfa y Omega*	19-00350
Alpha Guards Management Inc.*	19-00041
Amar Educational Services Inc.	19-00066
Ambassador Veterans Services of Puerto Rico L.L.C.	19-00048
America Aponte & Assoc. Corp.	19-00069
Apex General Contractors LLC	19-00062
Arcos Dorados Puerto Rico LLC	19-00070
Arieta & Son Assurance Corporation*	19-00074
Arieta & Son Assurance Corporation*	19-00352
Armada Productions Corp.	19-00076
Asociacion Azucarera Cooperativa Lafayette	19-00077
Atkins Caribe, LLP	19-00349
Avant Technologies of Puerto Rico Inc.	19-00079
Avanzatec LLC	19-00080
Badillo Saatchi & Saatchi, Inc.	19-00083
Barreras, Inc.*	19-00085
Beanstalk Innovation Puerto Rico LLC*	19-00087
BI Incorporated	19-00089
Bianca Conventon Center, Inc.	19-00072
Bio-Medical Applications of Puerto Rico, Inc.	19-00271
Bio-Nuclear of Puerto Rico, Inc.	19-00091
Bristol-Myers Squibb Puerto Rico, Inc.	19-00042
Cabrera & Ramos Transporte, Inc.*	19-00094
Campofresco, Corp.*	19-00073
Caribbean City Builders, Inc.*	19-00097
Caribbean Data System, Inc.	19-00078
Caribbean Educational Services, Inc.	19-00098
Caribbean Restaurant Inc.*	19-00099
Caribbean Temporary Services, Inc.	19-00104
Caribe Grolier, Inc.	19-00051
Caribe Tecno, Inc.*	19-00105

¹ An asterisk next to a vendor's name denotes that the action has been dismissed.

Defendant	Adversary Proceeding No.
Carnegie Learning, Inc.	19-00108
Carvajal Educacion, Inc.	19-00111
Casa Grande Interactive Communications, Inc.	19-00275
Case Solutions, LLC*	19-00115
CCHPR Hospitality, Inc	19-00116
Centro Avanzado Patologia & Terapia del Habla, Inc.*	19-00118
Centro de Desarrollo Academico, Inc.	19-00053
Centro de Patologia del Habla Y Audicion LLC	19-00121
Centro Medico del Turabo, Inc.	19-00136
Centro Psicologico del Sur Este P.S.C.	19-00140
Centro Sicoterapeutico Multidisciplinario Incorporado	19-00142
Chelo's Auto Parts	19-00144
Citibank, N.A.	19-00265
Clinica de Terapias Pediatricas, Inc.	19-00054
Clinica Terapeutica del Norte Inc.	19-00146
Community Cornerstones, Inc.	19-00043
Comprehensive Health Service, Inc.	19-00082
Computer Learning Centers, Inc.	19-00055
Computer Network Systems Corp.	19-00150
Corporate Research and Training, Inc.	19-00151
Creative Educational & Psychological Services, Inc.	19-00152
CSA Architects & Engineers, LLP	19-00153
Datas Access Communication Inc.	19-00156
Desarrollo Comunicologico de Arecibo Inc.	19-00158
Didacticos, Inc.	19-00161
Distribuidora Blanco, Inc.	19-00163
Distribuidora Lebron Inc.	19-00167
E. Cardona & Asociados, Inc.	19-00056
Eastern America Insurance Agency, Inc.	19-00279
Ecolift Corporation	19-00172
Ediciones Santillana, Inc.	19-00173
Editorial Panamericana, Inc.	19-00174
EDN Consulting Group, LLC*	19-00176
Educational Consultants, P.S.C.	19-00177
Educational Development Group Inc.	19-00101
Educre: Consultores Educativos Inc.*	19-00110
Eje Puerto Rico, Inc.	19-00272
Elias E Hijos, Inc.	19-00126
Empresas Arr Inc.	19-00084
Empresas Loyola, Inc.*	19-00086
Encanto Restaurants, Inc.	19-00132
Enterprise Services Caribe, LLC	19-00060
Estrada Bus Line, Inc.	19-00090

Defendant	Adversary Proceeding No.
Estudio Tecnicos, Inc.	19-00264
Evertec, Inc.	19-00044
Excalibur Technologies Corp.	19-00139
Explora Centro Academico Y Terapeutico LLC	19-00143
Facsimile Paper Connection Corp.	19-00092
Fast Enterprises LLC	19-00266
First Hospital Panamericano, Inc.	19-00093
Forcelink Corp.	19-00096
FP + 1, LLC	19-00148
Fridma Corporation	19-00100
Fusion Works, Inc.*	19-00154
Gam Realty, LLC	19-00159
General Investment LLC*	19-00169
Gersh International PR, LLC	19-00171
GF Solutions, Inc.	19-00063
Gila LLC	19-00354
Girard Manufacturing, Inc.	19-00103
GM Security Technologies, Inc.	19-00273
Gonzalez Padin Realty Company, Inc.*	19-00175
Grainger Caribe, Inc.	19-00270
Great Educational Services Corporation	19-00277
Gui-Mer-Fe Inc.	19-00182
Hewlett Packard Puerto Rico, BV LLC	19-00183
Hospira Puerto Rico, LLC	19-00186
Huellas Therapy Corp.	19-00065
I.D.E.A., Inc.	19-00268
Innovative Solutions Inc*	19-00046
Institucion Educativa Nets, LLC	19-00067
Integra Design Group PSC	19-00191
Intelutions, Inc.	19-00194
International Business Machines Corporation	19-00198
International Surveillance Services Corporation	19-00202
Intervoice Communication of Puerto Rico Inc.	19-00068
Isla Lab Products, LLC*	19-00211
J. Jaramillo Insurance, Inc.	19-00071
J.F. Educational Services Inc.*	19-00217
JLM Transporte, Inc.	19-00221
Johnjavi Corporation	19-00106
Jose Santiago, Inc.	19-00075
Junior Bus Line, Inc.	19-00229
Kelly Services Puerto Rico	19-00109
Kelly Services, Inc.	19-00113
Kid's Therapy Services, Inc.	19-00120

Defendant	Adversary Proceeding No.
L.L.A.C., Inc.	19-00122
Law Offices Wolf Popper P.S.C.	19-00236
Learning Alliance LLC*	19-00123
Leslie Rubero Multi Services*	19-00241
Light Gas Corporation*	19-00248
Linkactiv, Inc.*	19-00250
LS Innovative Education Center, Inc.	19-00252
Luz M. Carrasquillo Flores	19-00124
Macam S.E.	19-00255
Malgor & Co. Inc.	19-00257
Management, Consultants & Computer Services, Incorporated	19-00081
Mangual's Office Cleaning Service Inc.	19-00278
Manpower	19-00088
Mapfre PRAICO Insurance Company	19-00259
Margarita Hurtado Arroyo	19-00260
MC-21 LLC*	19-00262
MCZY Bus Services Inc.	19-00261
Mendez & Co. Inc.	19-00263
Merck Sharp & Dohme (I.A.) LLC	19-00276
Metro Center Associates*	19-00234
Michica International Co., Inc.	19-00238
Microsoft Corporation	19-00290
MMM Healthcare, Inc.	19-00095
Mudanzas Torres, Inc.*	19-00240
Multi Clean Services Inc.	19-00244
N. Harris Computer Corporation	19-00102
National College of Business and Technology Company, Inc.	19-00246
National Copier & Office Supplies, Inc.	19-00251
Nelson D. Rosario Garcia	19-00125
Netwave Equipment Corp.	19-00253
Next Level Learning, Inc.	19-00129
Nexvel Consulting LLC*	19-00131
NIBA International Corp.	19-00254
NTT Data Eas, Inc.	19-00256
O'Neill Security & Consultant Serv Inc.	19-00258
Oracle Caribbean, Inc.	19-00112
Panaderia La Sevillana, Inc.*	19-00233
Paso A Paso: Centro Interdisciplinario del Aprendizaje, Inc.*	19-00237
PDCM Associates, SE	19-00242
Pearson Education, Inc.	19-00245
Pearson Pem P.R., Inc.	19-00117
People Television, Inc.	19-00135
Perfect Cleaning Services, Inc.	19-00249

Defendant	Adversary Proceeding No.
Physician HMO Inc.	19-00178
Ponce de Leon Gun Shop Inc.*	19-00179
Populicom, Inc.	19-00180
Postage By Phone Reserve Account	19-00181
Printech, Inc.	19-00119
Procesos de Informatica, Inc.*	19-00185
Professional Consulting Psychoeducational Services, LLC	19-00188
Professional Records and Information Management, Inc.	19-00190
Promotions & Direct, Inc.	19-00192
Prospero Tire Export, Inc.	19-00196
Providencia Cotto Perez*	19-00137
Puerto Rico Supplies Group Inc.	19-00199
Puerto Rico Telephone Company, Inc.	19-00127
R. Cordova Trabajadores Sociales C S P	19-00138
Rafael Hernandez Barreras	19-00201
Ramirez Bus Line Inc.	19-00203
Ramon E. Morales dba Morales Distributors	19-00141
Rancel Bus Service, Inc.	19-00206
Raylin Bus Line Corp.	19-00208
Raymond Rivera Morales	19-00212
Reliable Health Services Corp.*	19-00216
Reyes Contractor Group, Inc.	19-00220
Ricardo Estrada Maisonet	19-00227
Ricoh Puerto Rico, Inc.	19-00128
Rock Solid Technologies, Inc.	19-00230
Rocket Learning, LLC	19-00232
Rocket Teacher Training, LLC	19-00235
Rodriguez-Parissi & Co., C.S.P.	19-00155
Rosso Group, Inc.	19-00239
S & L Development S.E.	19-00243
S.H.V.P. Motor Corp.	19-00134
Sabiamed Corporation	19-00274
Seguros Colon Colon, Inc.	19-00130
Semper Innova Corporation	19-00247
Service Group Consultant Inc.	19-00204
Servicio de Transportacion Juan Carlos Inc.	19-00205
Servicios Profesionales Integrados a la Salud, Inc.	19-00207
Sesco Technology Solutions, LLC	19-00162
Sign Language Interpreters, Inc.*	19-00210
Skanska USA Building Inc.	19-00351
SSM & Associates, Inc.*	19-00213
St. James Security Services, LLC	19-00145
Sucn Oscar Rodriguez Crespo	19-00165

Defendant	Adversary Proceeding No.
Suiza Dairy Corporation*	19-00215
Suzuki del Caribe, Inc.	19-00219
T R C Companies	19-00168
Tactical Equipment Consultants, Inc.	19-00222
Taller de Desarrollo Infantil y Prescolar Chiquirimundi Inc.	19-00049
Tatito Transport Service Inc.	19-00224
TEC Contractors, LLC*	19-00050
Telefonica Larga Distancia de Puerto Rico, Inc.	19-00226
The Boston Consulting Group, Inc.	19-00228
Tito Ramirez Bus Service Inc.	19-00231
Total Petroleum Puerto Rico Corp.	19-00114
Transcore Atlantic, Inc.	19-00348
Transporte Sonnel Inc.	19-00149
Transporte Urbina Inc.	19-00170
Trinity Metal Roof and Steel Structure Corp.	19-00187
Truenorth Corp.	19-00160
Union Holdings, Inc.	19-00189
Universal Care Corp. (Unicare)	19-00193
Value Sales Corporation	19-00195
Vazquez Y Pagan Bus Line, Inc.	19-00197
VIIIV Healthcare Puerto Rico, LLC	19-00164
VMC Motor Corp.*	19-00166
Wal-Mart Puerto Rico Inc.	19-00267
West Corporation*	19-00353
WF Computer Services, Inc.	19-00200
William Rivera Transport Service Inc.	19-00209
Wynndalco Enterprises, LLC*	19-00214
Xerox Corporation	19-00218
Cooper Power Systems, LLC	19-00380
Core Laboratories N.V. d/b/a Saybolt	19-00381
Excelerate Energy Puerto Rico, LLC	19-00382
Olimac Manufacturing Corporation	19-00383
Puerto Rico Nuevo Security Guards, Inc.	19-00384
Valmont Industries, Inc.	19-00385
WEG Electric Corp.	19-00386
Ready & Ready Responsible Security, Inc.	19-00387
Incom Investments Corp.	19-00439
Quest Diagnostics of Puerto Rico, Inc.	19-00440